

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO**

FRANKLIN E. LONG,	)	
	)	CASE NO. 3:09 CV 00915
Plaintiff,	)	
	)	JUDGE JACK ZOUHARY
v.	)	
	)	<b>MOTION FOR EXTENSION OF TIME TO</b>
MIDLAND CREDIT	)	<b>MOVE, PLEAD, OR OTHERWISE</b>
MANAGEMENT, INC.	)	<b>RESPOND TO PLAINTIFF'S COMPLAINT</b>
	)	
Defendant.	)	

Defendant Midland Credit Management, Inc. ("Midland") respectfully requests an additional thirty days up to and including September 4, 2009, to file its response to the Complaint of Plaintiff Franklin E. Long.

Defendant has neither requested nor received any prior such extension, and is not requesting this extension for any inappropriate purpose. Undersigned counsel has just been retained, however, and has not had the opportunity to collect documents and investigate the matter so that a proper response can be prepared.

For the foregoing reasons, Defendants respectfully request an additional thirty days up to and including September 4, 2009, to respond to Plaintiff's Complaint. For the Court's convenience, a proposed order granting this Motion is attached.

Respectfully submitted,

/s/ Brooke Turner Bautista

James S. Wertheim (0029464)

Brooke Turner Bautista (0072364)

**McGlinchey Stafford PLLC**

25550 Chagrin Blvd., Suite 406

Cleveland, OH 44122

Phone: (216) 378-9905

Fax: (216) 378-9910

[jwertheim@mcglinchey.com](mailto:jwertheim@mcglinchey.com)

[bbautista@mcglinchey.com](mailto:bbautista@mcglinchey.com)

*Counsel for Defendant*

*Midland Credit Management, Inc.*

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing *Motion for Extension of Time to Move, Plead, or Otherwise Respond to Plaintiff's Complaint* was served this 4th day of August, 2009 by regular U.S. Mail, postage prepaid, upon:

Franklin E. Long  
461 W. Lytle St., #130  
Fostoria, OH 44830

*Pro Se Plaintiff*

/s/ Brooke Turner Bautista

Brooke Turner Bautista

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FRANKLIN E. LONG,	)	
	)	CASE NO. 3:09 CV 00915
Plaintiff,	)	
	)	JUDGE JACK ZOUHARY
v.	)	
	)	<b>ORDER</b>
MIDLAND CREDIT	)	
MANAGEMENT, INC.	)	
	)	
Defendant.	)	

Defendant Midland Credit Management, Inc. has moved for an additional thirty days, through September 4, 2009, to file its response to the Complaint of Plaintiff Franklin E. Long. Upon consideration, said Motion is well taken.

WHEREFORE, Midland Credit Management, Inc. shall have through September 4, 2009, to answer or otherwise respond to Plaintiff's Complaint.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Judge Jack Zouhary